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April 20, 2021

VIA ECF

Magistrate Judge Debra C. Freeman
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: Antonio Morales et al. v. 740 Roast Corp. d/b/a Roast Kitchen et. al.
Index No.: 20-cv-03740 (ALC)**

Dear Judge Freeman:

This firm represents 740 Roast Corp. d/b/a Roast Kitchen (the "Company"), Peter Xenopoulos ("P. Xenopoulos") and Alexander Xenopoulos (A. Xenopoulos") (collectively, "Defendants") in connection with the above-referenced matter.

We jointly submit this letter with Plaintiff's counsel, to respectfully request that the Court So-Order the below revised proposed discovery schedule:

- Service of Initial Document Requests and Interrogatories: May 19, 2021
- Any Motion for Joinder of Other Parties or Amendments of the Pleadings: July 2, 2021
- Completion of Fact Discovery: November 23, 2021
- Expert Disclosures and the completion of Expert Discovery, if any: January 31, 2022

We thank Your Honor for your attention to this matter.

Respectfully submitted,
Kaufman Dolowich & Voluck, LLP

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Keith Gutstein

Cc: All Counsel of Record (via ECF)

4847-4399-3062, v. 2

At the telephone conference held on 2/9/21, this Court set the following deadlines: service of initial document requests and interrogatories by 3/11/21, motions to amend or for joinder by 5/3/21, and close of fact discovery by 6/30/21. Counsel have given no explanation as to why these deadlines could not be met. Accordingly, the application for an extension is denied, without prejudice to renew upon a specific showing of good cause.

SO ORDERED

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DEBRA FREEMAN
United States Magistrate Judge

Dated: 4/20/2021